

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	)	
	)	
	)	
v.	)	Case No. 2:08-cr-117
	)	
MICHAEL JACQUES,	)	
Defendant.	)	

**DEFENDANT'S MOTION FOR LEAVE TO EXCEED**  
**PAGE LIMIT FOR NON-DISPOSITIVE MOTION**

COMES NOW the Defendant, Michael Jacques, by counsel, David Ruhnke, Jean Barrett, and Michael Desautels, and pursuant to Local Rule 7(a)(4)(B), seeks leave of the Court to exceed the 15 page limit for a memoranda in support of a non-dispositive motion. As grounds for granting this motion, Defendant states that:

1. Michael Jacques is charged in a five-count Indictment. Count 1 charges him with kidnapping, in violation of 18 U.S.C. §1201(a). The Government has filed a Notice of Intent To Seek the Death Penalty as to Count 1.

2. Defendant intends to file a Motion to Transfer Venue in this case. The memorandum in support of this motion will exceed the 15-page limit which is set forth in the Local Rules of Procedure for the District of Vermont. (L.R. 7(a)(4), L.Cr.R. 1.)

3. The motion is premised upon the substantial amount of pretrial publicity that this case has received. In order to adequately summarize that publicity, the Defendant requests that the page limitation be expanded. Due to the seriousness of the issues presented in the motion, and the fact that this is a capital case, the Defendant asserts that granting this motion is warranted.

WHEREFORE, the Defendant respectfully requests leave to exceed the 15-page limitation with respect to the memorandum in support of his Motion to Transfer Venue..

Dated at Burlington, Vermont this 23rd day of February, 2010.

MICHAEL JACQUES

By: /s/ Michael L. Desautels  
MICHAEL L. DESAUTELS  
Federal Public Defender  
Office of the Federal Public Defender  
126 College Street, Suite 410  
Burlington, VT 05401  
(802) 862-6990  
(802) 862-7836 (Fax)

JEAN DeSALES BARRETT  
DAVID A. RUHNKE  
Ruhnke and Barrett  
47 Park Street  
Montclair, New Jersey 07042

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of February 2010, I electronically filed a Motion to Exceed Page Limit to Memorandum in Support of Non- Dispositive Motion, with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to the following: Craig S. Nolan and William Darrow, Assistant United States Attorneys, United States Attorney's Office, via ECF notice

/s/ Elizabeth K. Melcher  
Elizabeth K. Melcher  
Legal Secretary  
Federal Public Defender Office  
126 College Street, Suite 410  
Burlington, Vermont 05401  
802/862-6990